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Ex Parte

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

**Re: Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile
Broadband Networks – IB Docket No. 13-213; RM-11685**

Dear Ms. Dortch:

NCTA – The Internet & Television Association (NCTA) writes regarding Globalstar, Inc.’s revised proposal for terrestrial use of its licensed 2483.5-2495 MHz spectrum, submitted in the above-referenced proceeding on November 9, 2016.¹ As described in the November 9th filing and in Globalstar’s subsequent clarification filed on December 7, 2016,² under the revised proposal, Globalstar’s low-power terrestrial devices will operate entirely in its licensed Mobile Satellite Service spectrum at 2483.5-2495 MHz. NCTA understands based on Globalstar’s filings and on further technical discussions with Globalstar, that while Globalstar has no plans to operate in the unlicensed band at 2400-2483.5 MHz, any future use of that unlicensed band would fully comply with the Commission’s Part 15 rules, including all emissions limits. Those emissions limits would apply no differently to Globalstar than they would to any other unlicensed users.

Globalstar’s revised proposal, including the two proposed provisions set forth in Globalstar’s December Letter,³ would remedy the technical concerns raised in prior filings by

¹ Letter from L. Barbee Ponder, Globalstar, Inc., to Marlene H. Dortch, Secretary, FCC, IB Docket No. 13-213 (filed Nov. 9, 2016).

² Letter from L. Barbee Ponder, Globalstar, Inc., to Marlene H. Dortch, Secretary, FCC, IB Docket No. 13-213 (filed Dec. 7, 2016) (December Letter).

³ *Id.* at 2.

NCTA and CableLabs.⁴ Should the Commission adopt this language, NCTA would not object to the Commission's approval of Globalstar's revised proposal.

Pursuant to the Commission's rules, this letter is being filed electronically in the above-referenced proceedings. If you require any additional information, please contact the undersigned.

Respectfully submitted,

/s/ Danielle J. Piñeres

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⁴ See, e.g., Comments of the National Cable & Telecommunications Association, IB Docket No. 13-213, RM-11685, at 16-18 (filed May 5, 2014); Letter from Paul Margie, Counsel to NCTA, to Marlene H. Dortch, Secretary, FCC, IB Docket No. 13-213, RM-11685 (filed Apr. 16, 2015); Letter from Rob Alderfer, Principal Strategist, CableLabs, to Marlene H. Dortch, Secretary, FCC, IB Docket No. 13-213, RM-11685 (filed Apr. 14, 2015).